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April 11, 2022

VIA ECF

Honorable Andrew L. Carter
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: *K.A., et al. v. City of New York, et al.* 18-cv-3858 (ALC)(SLC)

Dear Judge Carter:

I am an Assistant Corporation Counsel in the office of Corporation Counsel, Hon. Sylvia O. Hinds-Radix, attorney for Defendants in the above-referenced action. I write—with Plaintiffs’ consent—to respectfully request permission to re-file Defendants’ motion for summary judgment at ECF 128, 129 and 131.¹ Pursuant to Your Honor’s Order granting Defendants’ prior request to file correctly redacted transcripts (ECF No. 133), the undersigned learned from SDNY ECF_error Quality Assurance office that the Bowe Declaration at ECF No. 129 would need to be entirely refiled rather than individual corrected exhibits, and that ECF No. 129 would be entirely marked “deficient.” Defendant will make this corrected filing today.

Defendant also respectfully requests that it be permitted to refile the 56.1 statement with the correct version, and an amended Memorandum of Law with corrected 56.1 citation. Plaintiff consent to this request as well. Defendant apologizes for any inconvenience for the Court.

Finally, on behalf all parties, I respectfully request an additional two-week extension of the remaining briefing schedule based on the filing of these amended papers: opposition papers due by May 13, 2022; reply, if any, due June 3, 2022.

Thank you for considering these requests.

Application GRANTED.

Andrew L. Carter
SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

Dated: 4/12/2022

Respectfully submitted,

/s/
Martin Bowe
Assistant Corporation Counsel

cc: all counsel of record. (via ECF)

¹ Defendant will not need to refile the documents filed under seal at ECF No. 130.